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May 4, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Ralph A. Haller
Chief, Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Re: Supplement to Request for
Clarification

Dear Mr. Haller:

This letter is designed to supplement the previous letter sent to you on April 19, 1994, on behalf of Geotek Communications, Inc. ("Geotek"). In the April 19 letter ("Clarification Request"), we responded to your request to provide the Bureau with a discussion of options on how the unintentionally restrictive effect of the 900 MHz technical "mask" on low power digital equipment could be cured.

Since the date of the Clarification Request, Geotek has examined the technical rules for Narrowband PCS. As you know, narrowband PCS is a broadly defined radio service that authorizes the provision of "any mobile communications service." 47 C.F.R. §§ 99.3-99.5. Like the technical rules for 900 MHz SMRs adopted in GEN Docket No. 84-1233,¹ the technical rules for Narrowband PCS are intended to permit the use of digital land mobile equipment. In addition, the frequencies allocated for Narrowband PCS are adjacent to frequencies allocated for 900 MHz SMR.² Therefore, the same technical interference

¹ See Amendment of Parts 2, 15, and 90 of the Commission's Rules and Regulations to Allocate Frequencies in the 900 MHz Reserve Band for Private Land Mobile Use, Report and Order, GEN Docket 84-1233, 2 FCC Rcd 1825, 1834, para. 68 (1986) ("900 MHz SMR Order").

² 900 MHz SMR frequencies are allocated at 896-901 MHz and 935-940 MHz; 900 MHz Narrowband PCS frequencies are allocated at 901-902 MHz, 930-931 MHz and 940-941 MHz.

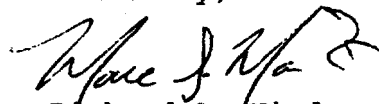
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concerns should be addressed by the equipment masks for both the 900 MHz and Narrowband PCS radio services. With this technical similarity in mind, Geotek conducted a variety of tests of the Narrowband PCS equipment mask.

As a result of its tests, Geotek has learned that the equipment mask for 900 MHz Narrowband PCS does not contain the so-called "tooth" that exists in the 900 MHz SMR technical rule (47 C.F.R. § 90.209(h)) that is the subject of the Clarification Request. See 47 C.F.R. § 99.411. Therefore, the Narrowband PCS technical rules provide additional evidence³ that the so-called "tooth" in the 900 MHz SMR equipment mask is, as we agreed in our meeting in your office on March 11, 1994, merely an unintended result of the 900 MHz SMR Order. The results of our tests have been incorporated into a graph attached for your review.

If you have any questions or need any additional information, please call either Rick Hindman or Marc Martin.

Sincerely,


Richard A. Hindman
Marc S. Martin

Enclosure

cc: Beverly G. Baker
Robert H. McNamara
Kent Y. Nakamura
F. Ronald Netro
Edward R. Jacobs
Rosalind K. Allen
Martin D. Leibman
Karen Rackley

³ See generally, Clarification Request and the technical addendum attached thereto.

GEOTEK

47 C.F.R. § 90.209(h), 99.411 100 Watt and 4 Watt

